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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
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11 Malibu Media, LLC, a California
corporation,

12 Plaintiff,
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14 v.

15 DEREK LIEU,

16 Defendant.
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Case No. 3:13-cv-00435-LAB-DHB

**JOINT MOTION TO DISMISS AND
CLOSE CASE**

1 Plaintiff Malibu Media, LLC (“Plaintiff”) and Defendant Derek Lieu
2 (“Defendant”), by and through their respective counsel, hereby jointly move the
3 Court to dismiss Plaintiff’s Complaint against Defendant, with prejudice, and
4 Defendant’s Cross-Complaint against Plaintiff, with prejudice. The parties have
5 agreed to settle this case pursuant to a confidential settlement agreement, and all
6 parties have fulfilled their obligations pursuant thereto. Accordingly, the parties
7 request that the Court dismiss this case. In light of the fact that Plaintiff and
8 Defendant are the only parties in this case, the case should be deemed closed.

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10 DATED: February 27, 2014

Respectfully submitted,

KUSHNER LAW GROUP

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15 By: /s/ Leemore L. Kushner

16 Leemore L. Kushner

17 Attorneys for Plaintiff Malibu Media, LLC

18 PIETZ LAW FIRM

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22 By: /s/ Morgan Pietz

23 Morgan Lietz

24 Attorney for Defendant Derek Lieu

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the Electronic Service List for this Case.

DATED: February 27, 2014

KUSHNER LAW GROUP

By: /s/ Leemore L. Kushner
Leemore L. Kushner
Attorneys for Plaintiff Malibu Media, LLC